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11 LAURI VALJAKKA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

16 LAURI VALJAKKA,
17 Plaintiff,
18 v.
19 NETFLIX, INC.,
20 Defendant

Case No. 4:22-cv-01490-JST

**DECLARATION OF WILLIAM P.
RAMEY, III IN SUPPORT OF MOTION
TO WITHDRAW AS COUNSEL FOR
PLAINTIFF LAURL VALJAKKA**

Hearing date: February 29, 2024
Time: 2:00 p.m.
Judge: Hon. Jon S. Tigar
Courtroom 6 – 2nd Floor

I, William P. Ramey, III, declare as follows:

1. I am over the age of 18, and I am a partner at Ramey LLP (“Ramey” or the “Firm”), Plaintiffs’ counsel of record in the above-captioned case. I would and could competently testify as set forth below in a court of law.

2. Susan Kalra is my co-counsel on this matter.

3. On January 12, 2024, I informed the client Lauri Valjakka and counsel for Netflix, specifically Elise Edlin that my Firm and all of its lawyers would be filing a motion to withdraw as counsel due to irreconcilable differences and lack of payment. I informed the client Valjakka both in a phone conference and by an e-mail following the phone call. I informed opposing counsel by e-mail. Both are opposed to I and my Firm's withdraw.

4. I seek to withdraw because, among other reasons, irreconcilable differences in strategy between my Firm and Valjakka, such that it will be extremely difficult for me or my Firm to meaningfully represent Valjakka effectively. Further, my Firm Ramey LLP is not being compensated for its services on this matter after AiPi LLC quit funding the lawsuit. The lack of compensation is a financial burden that makes it difficult for the Firm to operate. Ramey LLP only assumed representation because AiPi LLC guaranteed payment.

5. I respectfully request that I, my Firm and all of its lawyers are permitted to withdraw as counsel for Valiakka. Lauri Valiakka is an individual and can represent himself.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed January 16, 2024 at Harris County, Texas.

/s/ William P. Ramey, III
William P. Ramey, III